

Serghei Verlan
c/o 705 Manover St
Hamilton OH 45011

In the United States
District Court for the
Southern District of Ohio

United States of America)	Case No.
Plaintiff,) 1:18-cr-0109
VS) Request for
Serghei Verlan) property and
Defendant) money return
	Rule 41(e)

Comes now Defendant
Serghei Verlan
Requests the court to
Order the government to
return 3960 \$ (dollars) and
the following personal property:
This is what I witnessed during extradition:
1) Passport
2) Birth Certificate
3) Driver Licence
4) Brand new cellphone Samsung
Note 8

- 5) Used Samsung Note 8
- 6) Sunglasses Dita in original case
- 7) Sunglasses grey collar with staining
- 8) Sunglasses grey collar with metal frame and plastic coverage
- 9) Medallion
- 10) Used cellphone LG
- 11) Hard drive silver
- 12) Wallet
- 13) Suit case Samsonite
- 14) Hand bag Blue with leather handles
- 15) Black leather bag pack
- 16) Missoni green sandals
- 17) Brown and black leather sandals
- 18) Black t shirt Cavalli
- 19) Black t shirt #2 Cavalli
- 20) Blue t shirt #3 Cavalli
- 21) Buffalo t-shirt purple
- 22) Buffalo t-shirt green
- 23) Shorts green
- 24) Shorts yellow
- 25) Shorts burgundy

- 26) T shirt green
- 27) Grey handbag

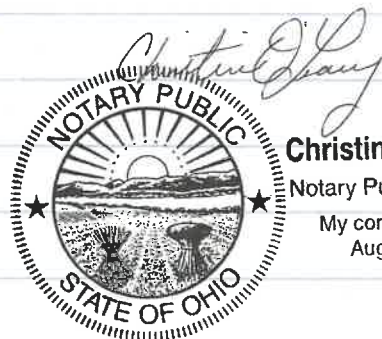
Other items I can not recollect
to be found in possession of
US Government

Shipping and mailing address:

Stanislav Verlan
20419 Windsor Trace Ln,
Richmond, TX 77407

Respectfully submitted on:
December 22, 2022

by:
Serghei Verlan
Verlan



Christina Marie Oleary

Notary Public, State of Ohio

My commission expires
August 31, 2027.

Your Honor!

Thank You For the opportunity to state my opinion during sentencing hearing.

There is one more personal issue I didn't have chance to address.

No one's money or personal goods were seized, but mine. In addition to property listed in motion there are other belongings I had on me. Over 4000 \$ worth shoes, jackets, other items were taken by Panamanian police. I did not commit any crime in Panama. During extradition hand over I addressed this issue with agents, which convoyed me. They told me they will not deal with it. Please help me to return money and property listed in motion.

I have been in custody FOR over 51 month. I paid lawyer in Republic of Panama to proceed with my voluntary expedited extradition. I paid MK Allen 25000. He did not complete my representation and withdrew himself, more, he did not provide me with any discovery. I filed complaint with Cincinnati Bar Association, trying to obtain refund. I appealed their decision in Supreme Court of Ohio. They denied. They told me case is complex. There is nothing wrong with not providing discovery in 27 months. At that time defendant Shuklin signed his Plea Agreement. They told me it is a Civil matter.

Jail has poor nutrition and high food prices. Phone calls almost 5\$. International 1\$ a minute.

Please see attached prove of e-mail OF discovery negotiations after 38 months

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Jail has poor nutrition and high food prices. Phone calls almost 5\$. International 1\$ a minute.

Please see attached prove of e-mail OF discovery negotiations after 38 months

As I mentioned all my shoes and warm clothes ~~were~~ taken by Panamanian Police and never returned.

I am destitute, I have no money to start my new life and buy basics.

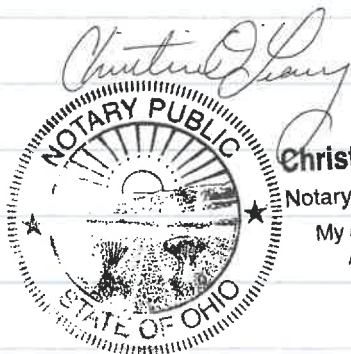
Please help me to obtain rest of my property and money, which are now in possession of US Government.

Thank You!

Sincerely,

Serghei Verlan

12/20/22



Christina Marie Oleary

Notary Public, State of Ohio

My commission expires
August 31, 2027.